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December 30, 2020

Via CM/ECF and Electronic Mail

Hon. John P. Cronan
U.S. District Court for the Southern District of New York
500 Pearl St.
New York, NY 10007

Re: **Moore, et al v. Cohen, et al., 1:19-cv-4977-JPC**

Dear Judge Cronan:

We represent Defendants Sacha Baron Cohen, Showtime Networks Inc. (“SNI”), and CBS Corporation n/k/a ViacomCBS Inc. (“ViacomCBS”) (collectively, “Defendants”) in the above-referenced case. We write, pursuant to this Court’s request at the December 18, 2020 hearing (Tr. at 37:11-15), to inform the Court that the parties have agreed to the following schedule for the remote depositions in connection with Defendants’ motion for summary judgment:

- January 13, 2021, at 5:00 p.m. Eastern Time: Plaintiffs’ deposition of Sacha Baron Cohen. This time was agreed to because it corresponds to January 14, 2021 at 9:00 a.m. in Australia, where Mr. Cohen currently resides.
- January 14, 2021, at 12:00 p.m. Eastern Time: Plaintiffs’ deposition of Jenifer Wallis.
- January 14, 2021, at 3:30 p.m. Eastern Time: Plaintiffs’ deposition of Todd Schulman.

Respectfully Submitted,

Davis Wright Tremaine LLP

/s/ Elizabeth A. McNamara

cc: Plaintiffs’ counsel (via CM/ECF and email)